

1 PHILIP GOODHART, ESQ.
Nevada Bar No. 5332
2 THORNDAL ARMSTRONG, PC
600 S. Las Vegas Blvd., Suite 400
3 Las Vegas, Nevada 89101
Tel.: (702) 366-0622
4 Fax: (702) 366-0327
png@thorndal.com
5

6 Attorneys for Defendant,
KEY INSURANCE COMPANY

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 APRIL RECKLING, an individual and as
assignee of GINO GIAMMANCO,

10 Plaintiff,

11 vs.

12 KEY INSURANCE COMPANY, a foreign
13 corporation,

14 Defendants.
15

Case No. 2:25-cv-00161

ORDER GRANTING JOINT STATUS
REPORT RE: STAY

16 Pursuant to this Court's Minute Order of June 24, 2025 (Doc. #18), counsel for Defendant
17 KEY INSURANCE COMPANY, Philip Goodhart, Esq. of THORNDAL ARMSTRONG, PC
18 and counsel for Plaintiff APRIL RECKLING, Sean D. Cooney, Esq. of COONEY FORBRUSH
19 PLLC and Jason Lather, Esq. of LATHER LAW, have met and conferred concerning how to
20 proceed with Plaintiff's claims. During that conversation, Plaintiff's counsel indicated that their
21 preferred course of action would be to stipulate to remand this case back to the Eighth Judicial
22 District Court and, once done, stipulate to transfer the case to the state court in Kansas.

23 Counsel has reviewed the status of the original Eighth Judicial District Court case, Case No.
24 A-24-908550-C which was removed to this Court, and determined that it was "statistically closed"
25 on February 4, 2025. Counsel believes that the most efficient way to achieve their desired result
26 would be to re-open the Eighth Judicial District Court case, and, once re-opened, remand this case
27 back to state court. Unfortunately, this cannot be accomplished by Monday, June 30, 2025. As
28 such, the parties jointly request that this Court allow the parties an additional fourteen (14) days to

1 accomplish the task of re-opening Eighth Judicial District Court Case No. A-24-908550-C and then
2 submitting a stipulation to remand this case back to state court.

3 This request is being made to further judicial economy and proceed as efficiently and
4 economically as possible.

5 DATED: June 27, 2025

DATED: June 27, 2025

6 CARMAN COONEY FORBUSH PLLC

THORNDAL ARMSTRONG, PC

7
8 */s/ Sean D. Cooney*


/s/ Philip Goodhart

9 SEAN D. COONEY, ESQ.
Nevada Bar No. 12945
10 JASON LATHER, ESQ.
Nevada Bar No. 12607
4045 Spencer Street, Suite A47
11 Las Vegas, Nevada 89119
Attorneys for Plaintiff

PHILIP GOODHART, ESQ.
Nevada Bar No. 5332
600 S. Las Vegas Blvd., Suite 400
Las Vegas, Nevada 89101
Attorneys for Defendant,
KEY INSURANCE COMPANY

12
13
14 IT IS SO ORDERED.

15
16 DATED the 1st day of July, 2025.


UNITED STATES DISTRICT JUDGE

17
18 Submitted by:

19 THORNDAL ARMSTRONG, PC

20
21 */s/ Philip Goodhart*

22 PHILIP GOODHART, ESQ.
Nevada Bar No. 5332
600 S. Las Vegas Blvd., Suite 400
23 Las Vegas, Nevada 89101
Attorneys for Defendant,
24 KEY INSURANCE COMPANY

Karen M. Berk

From: Candela Orio <candela@latherlaw.com>
Sent: Friday, June 27, 2025 5:22 PM
To: Philip Goodhart; Jason Lather; Sean D. Cooney; Brittany Turner
Cc: Karen M. Berk
Subject: RE: Reckling v. Key Insurance

Phil,

Attorney Lather is now leaving his bench trial. However, he wanted me to let you know that he agrees with the 2-week request and we will figure out how to reopen the state court case to proceed with the stipulation as discussed.

Best regards,

Candela Orio
Legal Assistant
LATHER LAW
4484 S. Pecos Rd.
Las Vegas, NV 89121
Office: (702) 979-3500
Fax: (702) 935-0071

From: "Philip Goodhart" <png@thorndal.com>
Sent: 6/27/25 4:58 PM
To: Jason Lather <jason@latherlaw.com>, "Sean D. Cooney" <seanc@cooneyforbush.com>, 'Brittany Turner' <brittany@ccfattorneys.com>
Cc: "Karen M. Berk" <KMB@thorndal.com>, "Candela@latherlaw.com" <Candela@latherlaw.com>
Subject: RE: Reckling v. Key Insurance

Thanks Jason.

Here is a proposed Joint Status Report. Please let me know if it is acceptable and I will get it filed today. It does not have the agreed upon stipulation attached, but I hope that it is adopted as we have requested a 14 day continuance.

Also, as noted, your office will have to re-open the state court case, and I am not sure how that is accomplished.

-Phil.

Philip Goodhart | President | Thorndal Armstrong, PC

PLEASE NOTE OUR NEW ADDRESS:

600 S. Las Vegas Boulevard, Suite 400

Las Vegas, NV 89101